

Purpose of the Personal Data Processing	Legal basis for Personal Data Processing	Scope of the Personal Data Processed	Duration of the Personal Data Processing	Access to Personal Data
<p>Preparation of the property purchase agreement between you, as a client of Cordia Management, and the sellers of the properties you wish to purchase, including providing information about the properties you are interested in.</p> <p>Cordia Management offers a “sales management” service to sellers, which includes preparing the property sale offer and, subsequently, the property purchase agreement. Cordia Management processes this data in a separate database (“Website Database”) jointly with Cordia Agent.</p> <p>In connection with the performance of the property purchase agreement, Cordia Management transfers buyers’ contact details (name, address, e-mail, telephone number) to the relevant condominium representatives. The purpose of this data transfer is to allow the condominium representatives to contact buyers promptly regarding</p>	<p>Section 6:288 of the Civil Code [<i>Brokerage contract</i>].</p> <p>Article 6(1)(b) of the GDPR – the data processing is necessary for the performance of a contract to which you (as a natural person) are party or to take steps at your request prior to entering into a contract.</p>	<p>The data provided on the https://cordia.hu/ website or submitted to Cordia through other channels (e.g., Facebook, Instagram, other social media platforms, real estate advertising sites, client registration forms) during a request for an offer, in particular:</p> <ul style="list-style-type: none"> • Name (first and last name) • E-mail and telephone number • Project of interest • Preferred move-in date • Apartment preferences (number of rooms, size, floor, orientation, other requirements) • Purpose of purchase (private use or investment) • Loan intention • Any other information or comments provided during the preparation of the property purchase agreement (e.g. callback requests and suggested times) <p>Cordia also processes your newsletter subscription status to track whether they are permitted to send you newsletters.</p> <p>Providing this data is required for the preparation, conclusion, and performance of the agreement. Property recommendations will be tailored based on the information you provide. Cordia may also send offers for properties</p>	<p>Cordia will delete the data 5 years after the termination of the contract, in accordance with Section 6:22 of the Civil Code.</p> <p>For tax purposes, Cordia will retain the data 5 years from the last day of the calendar year in which the tax return or declaration should have been filed, or, if no return/declaration is made, when the tax should have been paid (Section 78(3), 202(1) of the Taxation Act).</p> <p>If Cordia must retain the data under Section 169 of the Accounting Act, Cordia will delete it 8 years after the termination of the relationship, for example, if the data forms part of supporting accounting records, such as documents related to the conclusion of an agreement or invoices issued.</p>	<p>Sales director, deputy sales director, sales staff, and colleagues responsible for preparing purchase agreements at Cordia Management.</p> <p>Employees of Cordia Agent operating the Website Database.</p> <p>Joint controllership:</p> <p>Cordia Agent and Cordia Management belong to the same corporate group and operate the Website Database as joint controllers to optimise the corporate group operations.</p> <p>Cordia Agent’s primary task is to provide credit information for real estate purchases if a loan is requested.</p> <p>You may exercise your GDPR rights with respect to both Cordia Management and Cordia Agent.</p>

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their daily tasks related to the condominiums. Buyers may, of course, inform Cordia Management if they prefer to contact the condominium representatives themselves.		<p>similar to your request; for this purpose, knowing whether the property is for private use or investment is necessary.</p> <p>Without providing the data:</p> <ul style="list-style-type: none"> • Requests for an offer cannot be made. • Your property preferences cannot be identified. • No property purchase offer can be sent. • No agreement can be prepared. 		
<p>Data transfer to Cordia FM Társasházkezelő Korlátolt Felelősségű Társaság (“Cordia FM”)</p> <p>Data transfer occurs if you indicate on the Cordia website that you wish to use property management services, as well as property leasing, real estate agency, or other services (e.g. furnishing, accountant referral) related to property management. The purpose of the data transfer is to enable Cordia FM to provide you with an offer for the above services and, subsequently, conclude an agreement.</p>	<p>Section 6:272 of the Civil Code [Service contract] -Cordia FM enters into contracts directly with the property owner as the lessor and user of property management services.</p> <p>Article 6(1)(b) of the GDPR – the data processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract.</p>	<p>Data provided for the purpose of “preparation of the property purchase agreement between you, as a client of Cordia Management, and the sellers of the properties you wish to purchase, including providing information about the properties you are interested in.”</p> <p>Cordia FM acts as an independent data controller in accordance with its own data processing notice, available at https://cordia.hu/.</p> <p>The processing of data is required for the proper provision of real estate agency and property management services. It has no other consequences; without the data, Cordia FM cannot perform its property management activities. The data processed is limited to that provided for</p>	<p>Cordia will delete the data 5 years after the termination of the contract related to property leasing, real estate agency, or other activities, or in the event a contract is not concluded, in accordance with Section 6:22 of the Civil Code.</p> <p>For tax purposes, data will be retained 5 years from the last day of the calendar year in which the tax return or declaration should have been filed, or, if no return/declaration is made, when the tax should have been paid (Section 78(3),</p>	<p>Cordia Management: sales director, deputy sales director, sales staff, and colleagues responsible for preparing purchase agreements.</p> <p>Cordia FM: managing director, and persons involved in property leasing, real estate agency, and other related activities.</p>

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Cordia FM contact details: <ul style="list-style-type: none"> Address: 1082 Budapest, Práter utca 29/a fszt. 21 Website: https://cordia.hu/ Phone: +36 1 411 3000 E-mail: cordia.fm@cordia.hu 		the purpose of preparing the property purchase agreement between you (as a client of Cordia Management) and the sellers of the properties you wish to purchase.	202(1) of the Taxation Act). If retention is required under Section 169 of the Accounting Act, Cordia FM will delete the data 8 years after the termination of the relationship , for example, if the data forms part of accounting documents, such as contracts or invoices related to real estate agency activities.	
Creation of an online account on one of Cordia's websites. You have the option to create an online account with Cordia, where you can track properties that interest you and are available through Cordia in one place. Information regarding properties that have been sold in the meantime is also displayed. You can request offers for properties you have marked as favourites.	Article 6(1)(a) of the GDPR – your consent.	Data provided when creating an account: date of registration, name, e-mail, telephone number, password, properties you are interested in, and property offers sent. Providing your telephone number is optional. Its purpose is to enable Cordia sales staff to contact you by phone. However, if you request an offer for a specific property, your telephone number is essentially required to streamline communication for the preparation of the property purchase agreement between you (as a client of Cordia Management) and the sellers of the property. Without it, Cordia cannot prepare the property purchase agreement or efficiently schedule or adjust appointments.	You have the right to withdraw your consent at any time and delete your account via the website. By clicking the “delete account” button, you will receive a confirmation link at the e-mail address you provided. You must use this link to confirm your request to delete your account. The confirmation ensures that the request is genuine, coming from you and your e-mail account, and not from an automated system. The confirmation link is valid for 48 hours. The	Cordia Management's sales director, deputy sales director, sales staff, and colleagues responsible for preparing purchase agreements.

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		<p>If you create an account using Facebook registration, the data processed will include your Facebook ID, the e-mail address provided on Facebook, and your secondary e-mail address (if you do not use your primary Facebook e-mail).</p>	<p>deletion period begins upon confirmation. If you do not confirm within 48 hours, the link expires, and a new request must be submitted.</p> <p>Withdrawal of consent does not affect the lawfulness of data processing based on consent before its withdrawal. Once your account is deleted, the account is terminated, and all data stored therein will be deleted.</p>	
<p>Sending marketing materials by email and/or telephone (direct marketing) by Cordia.</p> <p>Cordia sends marketing materials, including personalised advertising, based on property search preferences. Direct contact is made with customers interested in purchasing or leasing properties sold by sellers associated with the Cordia Group, including properties listed on https://cordia.hu/, or in connection with other services, for the purpose of</p>	<p>Section 6(1) of the Advertising Act and Article 6(1)(a) of the GDPR – the prior, unambiguous and explicit consent of the data individual.</p> <p>Cordia profiles the individual's apartment search preferences (Article 22(2)(c) of the GDPR).</p> <p>The purpose of profiling is to:</p> <p>Assess the pool of interested parties for Cordia's projects and properties.</p> <p>Sending personalised marketing materials about the most relevant</p>	<p>Your name, newsletter registration date, e-mail address, and telephone number. The above data are recorded in the Website Database. For information on the operation of the Website Database, see the first row of the table.</p> <p>Your apartment search preferences – including, in particular, the purpose of purchase (investment or private use), the type of property (residential building), interest based on location and surroundings (e.g. suburban residential complex), the target purchase price, and the characteristics of the preferred property specified by the individual (e.g. number of rooms). For example, a person who previously expressed interest in a</p>	<p>You may withdraw your consent at any time (you can unsubscribe from advertisements and credit information), without restriction or justification, free of charge, using the contact details provided in this Data Protection Notice. Withdrawal does not affect the lawfulness of the data processing based on consent before its withdrawal.</p> <p>Upon unsubscribing, you will receive a confirmation link at the e-mail address you provided. This</p>	<p>Employees of Cordia Management and Cordia Agent who operate the Website Database and send advertising materials, and, in the case of credit information, Cordia Agent employees responsible for managing the Website Database.</p>

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<p>introducing the properties and services via telephone or e-mail (newsletter).</p> <p>Cordia Agent may also send credit information by e-mail and/or telephone to introduce clients to loans related to its services.</p>	<p>properties and projects.</p>	<p>suburban project may receive personalised marketing about a new suburban project.</p> <p>You can subscribe to the newsletter either when providing your data on the registration page of https://cordia.hu/ or under the “Subscribe to our newsletter” section. Providing your data is not mandatory; however, if you do not provide it, we will not be able to send you marketing materials or credit information.</p> <p>Source of data: your data stored on the https://cordia.hu/ website (Website Database), as well as your property purchase preferences and contact details provided to Cordia in other ways during a request for an offer, based on the subject and purpose of your interest.</p>	<p>confirmation ensures the request is genuine, coming from you and your email account, and not from an automated system.</p> <p>The confirmation link is valid for 48 hours. The unsubscription period begins upon confirmation.</p> <p>If you do not confirm within 48 hours, the link expires, and a new request must be submitted.</p>	
<p>Conducting customer satisfaction surveys - for example verbally, in writing, by email or by telephone - following the purchase of a property or the use of services provided by Cordia.</p> <p>Purpose of data processing:</p> <p>To understand clients’ needs, improve the quality of the</p>	<p>Article 6(1)(a) of the GDPR - your consent.</p>	<p>In connection with the purchase of a property and the use of other Cordia services, Cordia processes the contact and other personal data you provide, including preferences and data related to the use of services. This may include information relevant to the selection of properties and services, such as social status, monthly income, reading habits, and satisfaction with Cordia’s services and materials received.</p>	<p>You have the right to withdraw your consent at any time by sending a request to Cordia using the contact details provided in this Data Protection Notice.</p> <p>Withdrawal does not affect the lawfulness of the data processing based on consent before its withdrawal.</p>	<p>Employees of Cordia Management and Cordia Agent who operate the Website Database, process customer data sheets, and conduct satisfaction surveys.</p>

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services provided by Cordia and the properties sold, and monitor changes in the property market in order to respond to them.			Please note that if you withdraw your consent, Cordia may not be able to fully take into account your individual needs in relation to a particular property or service.	
Creation of an advertising target audience based on a customer list for social media marketing. This involves creating a target audience for displaying marketing messages on social media to individuals who have previously contacted Cordia, for example, when subscribing to a newsletter, requesting a quote, or purchasing a property.	Article 6(1)(a) of the GDPR – your consent You can set ad-free or reduced ad modes in your Facebook account via the following links: https://www.facebook.com/help/1241090626576242?helpref=faq_content&cms_id=1241090626576242 https://www.facebook.com/help/468797095528474	Your name and email address. Cordia cannot identify specific individuals in the target audience identified by Facebook based on the customer list, only knows the size of the target audience. To create the advertising target audience, Facebook uses the data shared by Cordia to determine whether the individuals have a Facebook account. The target audience consists of individuals who have contacted Cordia and have a Facebook account. Cordia can display personalised advertisements on Facebook to these individuals.	Until you withdraw your consent. Facebook will store the data transferred by Cordia for a maximum of 180 days. You have the right to withdraw your consent at any time by sending a request to Cordia using the contact details provided in this Data Protection Notice. Withdrawal does not affect the lawfulness of data processing based on consent prior to its withdrawal.	Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) acts as the data processor operating Facebook The data processing agreement between Cordia and Facebook, setting out the terms, conditions, rights, and obligations of the parties, is available here and here .
Identification of “lookalike advertising audiences” using Facebook Custom Audience (FCA) Facebook can display personalised ads related to	Article 6(1)(a) of the GDPR - your consent.	Advertising audience created based on your name and e-mail address. To create a lookalike advertising audience, Facebook selects users who are similar to the original customer list-based audience (see previous section) but are	Until you withdraw your consent. Facebook will store the data transferred by Cordia for a maximum of 180 days You can withdraw your	Meta Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland), acting as an independent data controller.

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Cordia's activities on its platforms to users with Facebook accounts who have previously interacted with Cordia and who have similar interests.		not included in that group. This selection is based on the geographical area and target ratio (e.g. 1% of the population) specified by Cordia. Personalised ads about Cordia's activities are then displayed to these users on Facebook. Cordia only sees the size of the lookalike audience and does not have access to individual users or their data.	consent at any time by sending a request to Cordia using the contact details provided in this Data Protection Notice. Withdrawal does not affect the lawfulness of the data processing based on consent before its withdrawal.	
Identification of “advertising audiences” using Google Customer Match. Cordia uses Google Customer Match to display personalised advertisements on Google's advertising platforms to individuals who have previously interacted with Cordia.	Article 6(1)(a) of the GDPR – your consent	Your e-mail address. Cordia provides Google with a list of individuals' e-mail addresses. Google encrypts these addresses using the SHA256 algorithm and compares them with its own encrypted database. This enables Google to identify users who belong to Cordia's target audience. The advertising target audience consists of individuals who have a Google account and have previously contacted Cordia. Cordia can display personalised advertisements related to its activities on Google's advertising platforms to these individuals.	Until you withdraw your consent. You have the right to withdraw your consent at any time by sending a request to Cordia using the contact details provided in this Data Protection Notice. Withdrawal does not affect the lawfulness of the data processing based on consent before its withdrawal.	Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, D04 E5W5, Ireland), acting as a data processor.
Identifying “lookalike advertising audiences” using Google Lookalike Segments. Google can display personalised ads related to Cordia's activities on its platforms to users with Google	Article 6(1)(a) of the GDPR - your consent	Your browsing data collected via a cookie provided by Google called “gclid,” placed on Cordia's websites. Cordia only has access to this data in aggregate form and cannot identify individual users.	Until you withdraw your consent to the placement of “gclid” cookie. You have the right to withdraw your consent at any time by sending a request to Cordia using the	Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, D04 E5W5, Ireland), acting as a data processor.

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accounts who have previously interacted with Cordia and who have similar interests.			contact details provided in this Data Protection Notice. Withdrawal does not affect the lawfulness of data processing based on consent prior to its withdrawal.	
Sending customer information from Cordia via email regarding properties sold by sellers associated with the Cordia Group – listed on https://cordia.hu/ – for which a signed registration agreement, preliminary property purchase agreement, or purchase agreement exists. This information covers the progress and important milestones of projects that affect the customer's property.	Article 6(1)(f) of the GDPR – Cordia's legitimate interest., to provide customers with advance (proactive) information about the status of the projects affecting their properties. The form is standardised and provides information on the status of all Cordia projects under development, including the project affecting your property.	Your name (first and last name), details of your property and the related Cordia project, and your e-mail address.	Until the completion of the project in question. You may object to receiving this customer information (you may unsubscribe from the customer information) at any time, without restriction or justification, free of charge, using the contact details provided in this Data Protection Notice.	Cordia Management employees involved in sending customer information.
Preparation of loan and account agreements related to the real estate purchase agreement between you, as a client of Cordia Management, and the sellers of the properties you wish to purchase, by OTP Bank Nyrt. ("OTP Bank"). OTP Bank (registered seat: 1051 Budapest, Nádor u. 16.;	Sections 6:382–6:415 of the Civil Code [<i>Credit and account contracts</i>]. Article 6(1)(b) of the GDPR – the data processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.	Your name (first and last name), e-mail address and telephone number, as well as the data listed under the data processing purpose "preparation of the property purchase agreement between you, as a client of Cordia Management, and the sellers of the properties you wish to purchase, including providing information about the properties you are interested in". Providing these data is a prerequisite for	OTP Bank must retain the personal data specified in Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing for 8 years, in accordance with the provisions of such Act. Pursuant to Section 169 of the Accounting Act, OTP Bank must retain	For the data transfer to OTP Bank: employees of Cordia Management and Cordia Agent who operate the Website Database, and real estate sales agents. At OTP Bank: OTP Bank's mobile bankers responsible for sending credit information and other related information.

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<p>website and contact details: www.otpbank.hu and informacio@otpbank.hu) will send you credit information and other information necessary for the conclusion of the related contracts by telephone and/or e-mail in order to prepare the loan and account agreements. For this purpose, Cordia will transfer your name, e-mail address and telephone number to OTP Bank.</p>		<p>preparing, concluding and performing the loan and account agreements by OTP Bank. You are not obliged to provide the data; however, without them, it will not be possible to identify the loan characteristics or related financial services you have requested for the property purchase, provide you with credit information or other related information, or prepare the contract(s).</p>	<p>accounting documents directly and indirectly supporting its bookkeeping (including general ledger accounts, analytical and detailed records) and thus the data contained therein in a legible form for at least 8 years, in a manner that allows them to be retrieved based on references in the accounting records.</p> <p>For contracts that have not been concluded, OTP Bank may process personal data until the expiry of the limitation period specified in Section 6:22 of the Civil Code, i.e. 5 years.</p>	<p>The detailed rules on data retention are included in OTP Bank's General Terms and Conditions, and its Terms and Conditions for Transactions.</p>
<p>Installation and operation of the Smart Home system and devices for home automation in residential properties.</p> <p>Cordia will transfer your data to the persons and companies involved in this process so that they can consult with you directly. One such party is Boston Technologies Kft., which installs the Smart Home system (registered seat: 1015</p>	<p>Chapter XXXVII of the Civil Code [<i>contracts aimed at producing a work</i>]</p> <p>Article 6(1)(b) of the GDPR – the data processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.</p> <p>Organisations involved in the installation and operation of</p>	<p>Your name, address, e-mail address and telephone number, as well as the address of the property concerned.</p> <p>The provision of data is a prerequisite for the preparation, conclusion and performance of contracts relating to the installation and operation of the Smart Home system and devices. Without the transfer of your contact details, it will not be possible to prepare the Smart Home contract(s) taking into account the specific characteristics of the property,</p>	<p>5 years after the completion of the installation and/or operation of the Smart Home system and devices, or the possible failure of the contract, in accordance with Section 6:22 of the Civil Code.</p> <p>Tax obligations: 5 years from the last day of the calendar year in which the tax return or declaration</p>	<p>Cordia's employees involved in the installation and operation of the Smart Home system and devices.</p>

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Budapest, Hattyú utca 18. III./5.; company registration number: 01-09-902980).	Smart Home systems and devices – as data controllers independent of Cordia – may have their own data processing terms (e.g. categories of data processed, data retention period, access rights, data security measures, etc.). These organisations can provide you with advance information about these conditions when you contact them directly.	nor will it be possible to procure, deliver, install or commission the Smart Home system and devices for you, or to carry out other related work.	should have been filed, or, in the absence of a tax return or declaration, the tax should have been paid (Section 78 (3), 202 (1) of the Taxation Act). Accounting obligations (Sections 168 - 169 of the Accounting Act): 8 years. In practice, this applies if the data forms part of documents supporting accounting related to the installation and operation of the Smart Home system and devices (e.g. the contract, settlement documents, or the invoice).	
Processing the data of contractual partners, their contact persons and persons involved in performance and performance monitoring for the purpose of fulfilling a contract (day-to-day performance). For example, agency contracts, business contracts, cooperation agreements - e.g. system support software contracts, introduction of accounting	Depending on whether the contract is concluded with the individual (e.g. private entrepreneurs) or with another company: Article 6(1)(b) of the GDPR - performance of a contract concluded directly with the individual. Article 6(1)(f) of the GDPR - the legitimate interests of Cordia and its contracting partner:	The names and contact details (e-mail, telephone number, mobile phone number, fax number) and any activities and communications related to the contract that contain personal data (e.g. communications from the contact person or any natural person acting on behalf of the partner). The personal data is provided to Cordia either by the contractual partner or by the individuals themselves.	5 years from the termination of the contractual relationship (Section 6:22(1) of the Civil Code – unless otherwise provided for in the Civil Code, claims expire after five years). Tax obligations: 5 years from the last day of the calendar year in which the tax return or declaration should have been filed, or in	Cordia's employees acting in the course of concluding and executing the contract in question.

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<p>systems, participation in foreign real estate exhibitions.</p> <p>This includes, for example, processing the postal addresses of contact persons, following the instructions of contact persons for the purpose of making payments, or sending official notifications using the contact details and information on contractual obligations to be performed.</p>	<p>performing contractual obligations, exercising rights, and cooperation between the parties.</p> <p>The provision of personal data is a contractual requirement; without the personal data, Cordia cannot conclude or perform the contract.</p>		<p>the absence of a tax return or declaration, the tax should have been paid (Section 78(3), 202(1) of the Taxation Act).</p> <p>Accounting obligations (Sections 168 - 169 of the Accounting Act): 8 years</p>	
<p>Processing the data of contractual partners, their contact persons and persons involved in performance and performance monitoring for the purpose of handling compliance matters related to a contract, including seeking legal remedies required to ensure contractual rights.</p>	<p>Article 6(1)(f) of the GDPR - Cordia's legitimate interest</p> <p>The legitimate interest: handling compliance issues related to the contract and carrying out any other tasks related to its enforcement, including seeking legal remedies necessary to ensure contractual rights.</p>	<p>The names and contact details (e-mail, telephone number, mobile phone number) and any activities and communications related to the contract that contain personal data (e.g. communications from the contact person or any natural person acting on behalf of the partner).</p> <p>Personal data is provided to Cordia either by the contractual partner or by the individuals themselves.</p>	<p>5 years from the termination of the contractual relationship (Section 6:22(1) of the Civil Code – unless otherwise provided, claims expire after five years).</p> <p>Tax obligations: 5 years from the last day of the calendar year in which the tax return or declaration should have been filed or, in the absence of such a return or declaration, when the tax should have been paid (Section 78(3), 202(1) of the Taxation Act).</p>	<p>Cordia's employees acting in the course of concluding and executing the contract in question.</p>

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			Accounting obligations (Sections 168 - 169 of the Accounting Act): 8 years. In practice, this applies if the data form part of documents supporting accounting, such as documents relating to the conclusion of a contract between Cordia and its partner (e.g. an order) or an issued invoice.	
Data processing related to the enforcement of the data protection rights of individuals (for details, see point 9.8)	<p>Article 6(1)(c) of the GDPR – the data processing is necessary for compliance with a legal obligation to which Cordia, as the data controller, is subject.</p> <p>Legal obligation:</p> <p>To enable the exercise of individuals' rights under Articles 15–22 of the GDPR and to document other steps taken in connection with such requests.</p>	<p>Personal data related to the data protection requests received by Cordia. For natural persons, legal entities, or other organisations contacting Cordia, this includes:</p> <ul style="list-style-type: none"> • Contact details of persons necessary for communication (e.g. name, address, e-mail, telephone number). • Content of the request. • Steps taken in connection with the request and any documents prepared. <p>Example: If an individual requests the deletion of all their data via e-mail in accordance with the GDPR and Cordia complies, Cordia will retain the e-mail containing the deletion request for documentation purposes.</p>	Indefinite, unless otherwise specified by the data protection authority.	The employees involved in handling the inquiry or answering the question, as well as Cordia's representative.

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Archiving the individuals' consent to the data processing and any withdrawal of consent	<p>Article 6(1)(c) of the GDPR – the data processing is necessary for compliance with a legal obligation to which Cordia, as the data controller, is subject.</p> <p>According to Article 7(1) of the GDPR, where the data processing is based on consent, the data controller must be able to demonstrate that the individual has consented to the processing of their personal data.</p>	If Cordia's processing of personal data was based on consent, Cordia will archive that consent to ensure that the lawfulness of the consent can be verified at any time. If the individual withdraws their consent, Cordia will also retain the withdrawal statement and any related communication, to ensure that Cordia is always aware that an individual has withdrawn consent for a specific data processing operation.	Indefinite, unless otherwise specified by the data protection authority.	Employees involved in the processing of consent and withdrawal of consent, as well as Cordia's designated representative.
Recording of personal data breaches (including documentation of steps taken in relation to the handling of the personal data breach)	<p>Article 6(1)(c) of the GDPR – the data processing is necessary for compliance with a legal obligation to which Cordia, as the data controller, is subject. Pursuant to Article 33(5) of the GDPR, the data controller must maintain a record of personal data breaches, including the facts relating to the breach, its effects, and the remedial actions taken. This record enables the data protection authority to verify compliance with the GDPR.</p>	Personal data of individuals related to the personal data breach.	Indefinite, unless otherwise specified by the data protection authority.	Employees involved in handling the personal data breach and Cordia's designated representative.